

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:14CR246 AGF (NAB)
	)	
THOMAS GREGORY ANDERSON, Jr., et al.,	)	
	)	
Defendants.	)	

**GOVERNMENT'S MOTION FOR COMPLEX CASE FINDING AND  
TO CONTINUE TRIAL DATE BEYOND LIMITS SET BY THE SPEEDY TRIAL ACT**

Comes now the United States of America by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri and John T Davis, Assistant United States Attorneys for said District, and requests the Court, pursuant to Title 18, United States Code, Sections 3161(h)(7)(A) and (B)(i) and (ii), to make findings that: (1) the case is so unusual or so complex that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by the Speedy Trial Act and (2) that the failure to grant a continuance to determine whether and what pretrial motions should be filed in the proceeding and/or prepare for trial would result in a miscarriage of justice.

The Government, in support of its motion, states as follows:

1. This case involves a complex long-term drug conspiracy in which eleven defendants are named in two counts alleging a long term marijuana conspiracy and a money laundering conspiracy. The Indictment contains a forfeiture allegation as well.
2. The Government estimates that the trial in this case could last multiple weeks depending upon the number of defendants electing to proceed to trial. A more accurate estimate can be made when the number of defendants electing to go to trial has been determined.

3. The discovery in this case is voluminous and involved two wiretaps of defendants Brian Lord and Thomas Anderson, Jr.'s cellular telephones. The case as involves multiple Pen Register Orders and PLI's, a wiretap by consent and multiple search warrants. The discovery in the case also includes hundreds of pages of documents and photos and monitored conversations. Additionally, there are several arguably suppressible events that occurred during the investigation.

4. The Government has been working on the investigation for some time and is prepared to try this case within the time limits set forth under the Speedy Trial Act. However, the Government recognizes that in light of the number of defendants, and the nature of the conspiracy and substantive charges, and the aforementioned voluminous discovery, it is unreasonable to expect the defense to have adequate preparation for pretrial proceedings or for the trial itself within the time limits established by the Speedy Trial Act.

5. Additional time would likely assist defendants and defense counsel in fully reviewing discovery, preparing for evidentiary hearings and trial and/or completing plea negotiations with the Government.

6. Pursuant to Title 18, United States Code, Sections 3161(h)(7)(A) and (B)(i) and (ii) and for all the foregoing reasons, the United States requests this Court to make specific findings that the trial of this matter should be continued past the limits set by the Speedy Trial Act because the ends of justice served by continuing this case outweigh the best interest of the public and the defendants in a speedy trial, the case is so unusual and so complex that it is unreasonable to expect adequate preparation for pretrial proceedings and the failure to exclude this period would likely result in a miscarriage of justice.

WHEREFORE, the Government respectfully requests that the Court make such findings, set a motion deadline and an evidentiary hearing consistent with the complexity of the case, and order the time elapsed between any motion waivers and trial setting excluded from Speedy Trial Act calculation. 18 U.S.C. §3161(h)(7)(A), (B)(i), and (B)(ii).

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 24, 2014, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Courts electronic filing system upon all counsel of record.

s/ John T Davis  
Assistant United States Attorney